



Intermountain Forest Association

2218 Jackson Blvd, Ste 10, Rapid City, SD 57702
605-341-0875 Fax 605-341-8651

December 29, 2017

Mr. Dan Dallas
Rio Grande National Forest
1803 W. Highway 160
Monte Vista, CO 81144

Dear Mr. Dallas:

Attached are our comments on the Draft Rio Grande NF Revised Land Management Plan (Plan) and Draft Environmental Impact Statement (DEIS). Several overarching comments are:

Public involvement

The 2012 Planning Rule puts significant emphasis on providing an opportunity for collaborative public involvement during the plan revision process. We agree that the RGNF held a lot of public meetings to inform the public, however, the process fell short in terms of opportunities for meaningful participation. For instance, most of the public meetings were simply a forum for the FS to walk attendees through the information, without an opportunity for a meaningful two-way dialogue with the FS or other stakeholders. The process would have been better served if area specific workgroups could have been used. Rather than FS specialists and internal staff coming up with the Plan Components, it would have been nice to have that conversation include the public. Instead, we were left out until the draft plan was released.

Not only would more collaborative involvement with stakeholders have resulted in a better plan, more importantly, it would have given ownership to the participating stakeholders. Following are three quotes that highlight the benefits of collaborative involvement:

"The ideal management of our public lands would be through shared stewardship."
-USDA Secretary Sonny Perdue, Idaho Statesman, June 1, 2017.

"An okay plan with strong partnerships will succeed, while a 'perfect' plan with no support will fail." - Peter Gaulke, Southern Region Planning Director, Forest Planning Advisory Committee meeting, Atlanta, August 1-3, 2017.

“We can’t do this alone and only on National Forest System lands. It takes others to help us make a difference on the whole landscape. We will work with all citizens—from rural and urban communities—as we pursue the work in front of us. Strengthening and expanding partner and volunteer programs around shared values is critical for a sustainable future.” – Chief Tony Tooke, Leadership Corner Blog, October 27, 2017.

We see a wealth of expertise and willingness to work with you and your staff to craft an effective forest plan, and urge you to take a much more collaborative approach in finalizing the revised Plan than was used to develop the draft revised Plan. Given the magnitude of needed changes to the draft Plan, we also recommend another opportunity for public review and comment.

Plan Components - The definitions of Plan Components, i.e., Desired Conditions, Objectives, Standards, and Guidelines, on pages 1-2 should be rewritten to conform with the definitions in 219.7. For example –

-Desired Conditions – most Desired Conditions do not meet the 2012 Rule definition of a Desired Condition because they are not measurable and cannot be monitored to determine whether or not they are being achieved. For example, DC-RNG-3, “Rangelands sustain biological diversity and ecological processes,” is not measurable, cannot be monitored, and is fairly meaningless. We recommend rewriting all Desired Conditions to conform to the definition in the Planning Rule.

-Objectives – most, but not all (such as OBJ-SCC-1 and 2,) of the Objectives are time-specific and measurable. However, the various Objectives use several different measures of time frames, including 1) “over the planning period,” 2) “over the life of this plan,” and 3) “over a 10-year period.” Each are problematic in lack of precision or failure to account for all the years until a next plan revision. We recommend that the Objectives be rewritten to have consistent time periods, and we specifically recommend “per decade” or “per year.”

-Management Approaches – the Plan overuses and missuses Management Approaches. According to FSH 1909.12-22.4, optional plan content, including Management Approaches “must not be labeled or worded in a way that suggests it is a plan component.” The Management Approaches in the Plan do not conform to that direction. We recommend that you review each Management Approach to determine if it is more appropriate as a Plan Component. We also recommend, once the revised Plan is enacted, that Management Approaches not be changed or deleted or added without an opportunity for public review and comment.

Finally, many of the Plan Components are duplicative or overlapping (for example, we counted 7 different Plan Components, plus 1 Table, that address snags) or wordy. The Plan Components, as a whole, would benefit from some serious editing.

Lynx – The Southern Rockies Lynx Amendment was developed as short-term direction until the affected forest plans were revised. In the ROD, the Regional Forester committed to reviewing and reconsidering the SRLA direction during the plan revisions. We recommend 1) that SRLA

direction be incorporated into the revised Plan instead of leaving it in an Appendix, 2) that equal emphasis be given to the SRLA Objectives as to Standards, 3) that Conservation Measures from the 2013 LCAS be considered, 4) that VEG-S7 be incorporated with modifications, 5) that you provide an opportunity for more discussion about the proposed Lynx Management Approaches and Supplement to VEG-S-1, and possible modifications to those, 6) a reconsideration of direction to minimize snow compaction, 7) an opportunity to participate in updated lynx habitat mapping, 8) considering non-occupied status for portions of the RGNF that are not occupied by lynx, 9) designing Plan Components for connectivity to minimize the adverse effects on forest management, and 10) thinking about long-term lynx habitat management and how to design complementary lynx habitat and forest management strategies.

Species of Conservation Concern - We are very concerned that so many plant species were identified as SCC without any basis to conclude there is “substantial concern about the species’ ability to persist in the plan area over the long term.” According to FSH 1909.12, 12.52c, “If there is insufficient scientific information available to conclude there is a substantial concern about a species’ ability to persist in the plan area over the long term, that species cannot be identified as a species of conservation concern.”

We are also concerned about the lack of documentation on whether ecological plan components are adequate or species-specific plan components are necessary. The information in DEIS Tables 58 and 59 identifies ecological conditions, but doesn’t discuss development and implementation of Plan Components to ensure those ecological conditions. Plan Appendix D Tables 21 and 22 and DEIS Appendix C Table 121 are very helpful, and we recommend adding an additional column to those tables to give an overview of how Plan Components will ensure those needed ecological conditions.

Planning Documents – overall, it was very difficult to review the planning documents, which included the draft revised Plan, the DEIS, various reports, other referenced direction, and the Assessments. In many cases, it would have been much more helpful to have had more discussion in the DEIS about specific proposed Plan Components instead of a more generic discussion. In some cases, discussion in the DEIS seemed to be purposefully vague (for example, the statement in the 2nd paragraph on p 215 that simply refers to “revised direction in alternatives B, C, and D,” with no explanation about the purpose or effects of the revised direction) and in other cases important information was buried (preliminary results of Squires’ lynx research on RGNF included on p 23 and 25 of the Wildlife Report, but not included in the DEIS; Squires’ publications about RGNF research were included in the References for the Wildlife Report, but not in the References for the DEIS). We understand the tension about length of documents, but, if you’re going to propose revised direction, then you owe it to readers to be transparent about the underlying rationale and implementation effects.

Use of BASI is required by the 2012 Planning Rule, but it was virtually impossible to tell what the FS thought was the BASI or how it was used. There were numerous Plan Components for which there was no discussion anywhere in the DEIS about the rationale for including them in the draft revised Plan and similarly, no explanation for how the BASI was used in their development. We request that you make more information available following the end of the comment period and the release of the final revised Plan.

Recommended Alternative – Of the three new alternatives, we feel that Alternative C is the best alternative in terms of actively managing the forest, protecting local jobs, and ensuring there is a forest in the future. Alternative C not only salvages more acres in the first 6 years, but also proposes to treat the most acres in the second decade. Ideally, the RGNF should be maximizing salvage in the next 3-5 years, before the dead trees deteriorate and are no longer useable. Alternative C also proposes zero acres of new wilderness, maintaining the flexibility to respond to events such as wildfire, insects and disease, drought, and climate change. Alternative C shows the greatest movement toward achieving desired conditions and Alternative C has the greatest economic impact of the three alternatives, as well as the highest number of associated jobs. Given this, we recommend selection of Alternative C, as modified by these comments, for the revised forest plan.

That being said, the 2018 timber target for the RGNF is 90,000 ccf. The increased target is a direct response of the Rocky Mountain Region of the USFS (Region 2) prioritizing funding in order to facilitate critical salvage operations prior to the wood deteriorating. We recommend updating Alternative C to show up to 90,000 ccf of salvage for at least the first three years, and possibly up to five years if the mortality continues to spread, before tapering down.

Future Timber Harvest/ Cumulative Operational Restrictions – we are very concerned with the overall draft plan in terms of future timber harvest and availability of timber for the existing forest products companies. As stated above, we recommend that you incorporate the Forest's current 90,000 ccf annual target into the selected Alternative. We also recommend that you continue a salvage program into the second decade, for house logs and other products that can be made from the dead trees. One of the primary users of wood from the RGNF is a log home manufacturer who depends solely on standing dead volume.

Furthermore, as written, the cumulative effect of various Desired Conditions, Objectives, Standards, and Management Approaches will likely further reduce the amount of acres of treatment that can be implemented. For instance, DC-VEG-4 basically eliminates any green spruce treatment, whereas G-SCC-3 will virtually prohibit harvest in ponderosa pine or mixed conifer stands and G-WLDF-1 has severe timing restrictions. Cumulatively, it appears that the Plan will not allow timber harvest in green spruce, green fir, ponderosa pine, or mixed conifer stands. This is a problem, and this problem will make it difficult to impossible for the Forest to “contribute forest products ... that are important to local economies, and provide ecosystem services” (Goal 3). If that's the case, there will likely not be any forest products companies, which are your most cost-efficient tool to “diversify age classes and structure, seral stages, and habitat classes” (Goal 2) still in business. We urge you to carefully review this cumulative effect and reconsider the contributing Plan Components.

We also recommend that specific timing restrictions be generally deferred to project planning, when the Responsible Official and Interdisciplinary Team will be able to develop more targeted restrictions based on specific areas, issues, and significance.

Monitoring – the Monitoring Plan is very superficial and falls far short of meeting the requirements of 219.12 and our expectations. In particular, the Monitoring Plan must be

expanded to include monitoring of Desired Conditions and Objectives; as already discussed, most of the proposed Desired Conditions must be rewritten to be measurable in order to be monitored, the Monitoring Plan needs to include monitoring of Plan Objectives, we request an opportunity to be involved in selection of focal species and monitoring protocols, and we request an opportunity to be involved in development of Adaptive Management Questions.

Adaptive Management – we applaud and support the approach outlined on page 111. Our only recommendation is that the annual posting and meeting include annual monitoring results.

Thank you for your consideration. We would welcome the opportunity to work with you, your staff, and other stakeholders on the details of the revised Plan.

Sincerely,

Thomas A. Troxel

Thomas A. Troxel
Executive Director

IFA Comments on RG Draft Land Management Plan and DEIS

Draft Revised Land Management Plan

Chapter 1. Introduction

Goals –

-Goal 1 – we generally agree with the sentiment of Goal 1. However, the discussion about the National Forest Reserve Act of 1891 does not accurately reflect the discussion of that Act in Muhn, 1992. For example, according to Muhn, 1992, “The [Forest Reserve Act] set aside the public lands withdrawn under its provision from further settlement and appropriation but did little else.” It was the Organic Administration Act of 1897 that provided for uses and protections summarized in the second and third sentences of the first paragraph. We recommend that you add discussion about the role of vegetation management in maintaining or restoring healthy and functioning watersheds.

We recommend the following edit to the first sentence – “National forests were initially created under the National Forest Reserve Act of 1891, which authorized the President ...”

-Goal 2 – we agree with the goal of increasing forest diversity and resilience. However, as currently written, Goal 2 seems to rely entirely on natural processes to achieve increased diversity and resilience; we recommend adding references to active management, using timber harvest, mechanical treatments, and prescribed fire as tools as achieve those. We also recommend deleting “Where appropriate in the next planning horizon.” Finally, we believe that “habitat connectivity” is over-emphasized and recommend you delete the reference to “habitat connectivity.”

Goal 3 – we recommend changing “contributes” to “provides” in the first sentence. We also recommend deleting “natural-appearing” in the first sentence of the second paragraph, as that could be read to require that the only management activities allowed will be those that are “natural appearing;” further, the West Fork Fire and the spruce beetle epidemic are ‘natural,’ but we don’t want to see those replicated in the future.

Adaptive Management

Management Approaches – Management approaches are not Plan Components, and cannot be used as Plan Components. We do not support the use of Administrative Changes to change Management Approaches as a way to get around public involvement.

Background, Roles, and Contributions of the Forest –

-this discussion seems long, rambling, and without any particular purpose, kind of like the opening chapter of a long novel. We recommend you rewrite this section to condense and focus it.

p 8, last paragraph –

-we recommend that you rewrite the paragraph as follows to be more accurate – “The USFWS defined the Southern Rocky Mountains of Colorado and southern Wyoming as a “provisional” core area because it contained an introduced lynx population that had demonstrated reproduction. The Rio Grande NF is included in that “provisional” core area. The vast majority of Canada lynx in Colorado live in the high-elevation spruce-fir forests in the southwestern part of the state, including the Rio Grande NF.”

Chapter 2. Forestwide Direction

Aquatic Ecosystems –

-the DCs overlap, do not meet the definitions of Desired Condition, and should be rewritten to be concise and measurable.

-G-FISH-2 does not meet the definition of a Guideline. As written, it would be better labeled as a Goal. Frankly, we’re not sure it adds much to the Plan, and recommend that you simply delete it.

Groundwater-Dependent Ecosystems –

-DC-GDE-1 – we recommend that you delete the second sentence.

-G-GDE-2 – we recommend that you delete the first sentence.

-MA-GDE-2 – the operative portion of this MA is that fens will be inventoried. We don’t see any reason to monitor and evaluate all fens on the RGNF, and recommend you delete this MA.

Riparian Management Zones –

-As a general matter, Riparian Management Zone widths should be in the body of the Plan, not in an Appendix.

-According to Appendix F (not Appendix M, as stated), Riparian Management Zones are 100 to 300 feet on each side of the various categories of streams. We recommend that Riparian Management Zones be no wider than 50-100 feet. That would be consistent with 1) the R2 Watershed Conservation Handbook (requires RMZs to be the greater of 100 feet or the mean height of mature trees), 2) the NRCS in Montana (50 or 100 feet), and 3) the Colorado Forestry Best Management Practices (50 feet). There is no documentation supporting the need for a wider RMZ on the RGNF. See comments below on Appendix F.

We recommend you add the NRCS SMZ Rule for Montana to the bibliography - (https://www.nrcs.usda.gov/wps/portal/nrcs/detail/mt/technical/landuse/forestry/?cid=nrcs144p2_057167) as well as the Colorado Forestry BMPs (Colorado State Forest Service. 2010. Forestry Best Management Practices to Protect Water Quality in Colorado. 28 pages).

-We recommend that you rewrite all of the DCs to conform to the definition so they are measurable and monitorable. They should also be condensed.

-We also recommend adding the following from FS 990A – “Proactively manage the AMZ to maintain or improve long-term health and sustainability of the riparian ecosystem and adjacent waterbody consistent with desired conditions, goals, and objectives in the land management plan.”

Watershed –

-The DCs need to be rewritten to conform to the definition so they are measurable and monitorable. They should also be condensed.

-The Objectives should be rewritten to be specific about the work to be accomplished.

S-WA-1 – We recommend including direction in Plan Components in the Forest Plan, and not simply including a reference to some other document.

G-WA-1 and 2 – these do not conform to the definition of Guidelines, and should be rewritten.

-The DEIS, p 180 discusses potential flow increases associated with timber harvest. Since virtually all of the current and projected timber harvest is in dead trees, there should be very little effect on stream flows. We recommend that you edit the first and second paragraphs to clarify that.

-DEIS, p 182 discusses at great length the potential for sedimentation from roads. However, there is no discussion about 1) the benefits of BMPs or current design, construction, and maintenance techniques in keeping sedimentation at ‘natural’ levels, 2) the results of monitoring sedimentation on the Rio Grande NF, 3) the role of timber sales in providing road maintenance and keeping drainage structures functional, and 4) monitoring results of Colorado Silviculture BMPs. Those are generally discussed in the third paragraph on p 180. We recommend editing the section on Effects from Roads and Trails to include the discussion on p 180, 3rd paragraph, plus add the following:

-Troendle, Charles et al. The Coon Creek Water Yield Augmentation Project. Forest Ecology and Management 143(2001). Specifically, we recommend the discussion about “minimal, if any, increase in sediment transport concentrations” associated with road construction and timber harvest.

-Colorado State University Water Center. Colorado Water. March/April 2017, “Forestry and Water. Specifically, we recommend the discussion about stream water quality concerns lingering long after the smoke has cleared.

-2014 Colorado Best Management Practices Field Monitoring Report. August 2107. Colorado State Forest Service. Specifically, we recommend referring to the findings for federal timber sales of 92% for BMP application and 97% BMP effectiveness.

Native Animals and Plants – Pollinators

We agree on the importance of pollinators, but we do not understand restoring 65,000 acres of “pollinator habitat,” the Standard on mitigation, or how impacts on pollinators can or should be considered in project planning. We recommend a serious rewrite, as a minimum, and preferably deleting this section in its entirety.

Species of Conservation Concern (SCCs)

-We recommend Boreal toad, Rio Grande chub, Rio Grande Cutthroat trout, and Rio Grande sucker as SCCs. See our attached spreadsheet for detailed comments.

We are especially concerned that so many plant species were identified as SCC without any basis to conclude there is “substantial concern about the species’ ability to persist in the plan area over the long term.” According to FSH 1909.12, 12.52c, “If there is insufficient scientific information available to conclude there is a substantial concern about a species’ ability to persist in the plan area over the long term, that species cannot be identified as a species of conservation concern.”

We are also concerned about the lack of documentation on whether ecological plan components are adequate or species-specific plan components are necessary. We recommend adding that information in an additional column in Plan Appendix D, Table 21 and DEIS Appendix C, Table 121.

-As with other portions of the draft revised plan, the Plan Components for SCCs need some serious rewriting so they conform to the 2012 Rule definitions.

-The Desired Conditions all need to be rewritten to include enough specificity that they can be measured and progress toward their achievement can be monitored.

-Neither of the Objectives are measurable and time-specific.

-Standard S-1 should be rewritten to be more specific about the intent and definition of “avoid disturbance” for project design and implementation.

G-SCC-3 – this Guideline should be rewritten as a DC with more detail about desired quantities of specified habitat conditions for Flammulated Owls, plus a time period to achieve those conditions. According to the discussion on p 171, Flammulated owls are threatened by the loss of suitable nesting habitat, specifically replacement of open, old growth ponderosa pine and mixed conifer forest with younger, high density vegetation, as a result of departure from historic fire regimes and landscape scale disturbances. The loss of suitable nesting habitat is not the result of project level impacts, therefore, a Guideline to “Reduce project level impacts” to nesting territories isn’t going to address the problem or help the Flammulated Owls.

Further, according to Table 6 (p 39), 49% of the Ponderosa Pine stands on the RGNF are already in Mature-Open Structural Stage; if that’s not an adequate percentage, then the

DC must identify what is the desired percentage of open ponderosa pine. If you really want to help Flammulated Owls, why not include an Objective to restore (fill-in-the-blank) acres of Flammulated Owl nesting habitat per decade.

MA-1 - We do not support a general intent to map populations of TEPC insect species across the Forest.

MA-2 should be moved to TEPC species.

- It is impossible to tell how the Plan Components will affect forest management or benefit SCCs. All of the Plan Components need to be rewritten to conform to their respective definitions, so they are concise, specific, measurable, and monitorable.

Canada Lynx

-The entire Canada Lynx issue is very complex. We would appreciate an opportunity to discuss the details of current and proposed lynx direction and our comments with you and/or your staff during the process to finalize the revised Plan.

-In the SRLA Record of Decision, the Forest Service committed to reviewing and reconsidering the direction in the SRLA when the forest plans for each of the affected national forests is revised. We view the revision of the RGNF forest plan as an opportunity to consider what has been learned since the SRLA was approved, and, using that information, to update the lynx direction in the revised forest plan.

-We recommend that you incorporate the SRLA direction into the Revised Plan. There is no reason to leave it in a Plan appendix.

-Implementation of the SRLA has focused disproportionately on the Standards with virtually no attention paid to Objectives VEG 01 and VEG 02, which state:

-VEG 01 - Manage vegetation to mimic or approximate natural succession and disturbance processes while maintaining habitat components necessary for the conservation of lynx.

-VEG 02 - Provide a mosaic of habitat conditions through time that support dense horizontal cover, and high densities of snowshoe hare. Provide winter snowshoe hare habitat in both the stand initiation structural stage and in mature, multi-story conifer vegetation.

We recommend that the Plan also demonstrate compliance with VEG-01 and VEG-02. This is also consistent with the 2013 LCAS Conservation Measure for vegetation management (p 96), which states - "Provide a mosaic of forest structure that includes dense early successional coniferous and mixed-coniferous-deciduous stands, along with a component of mature multi-story coniferous stands." We recommend that you take a hard look at long-term desired conditions and objectives for long-term biodiversity, including lynx habitat. We also

recommend reviewing Lynx direction and Vegetation Management direction, in particular, DC-VEG-2, DC-VEG-8, OBJ-VEG-1, OBJ-VEG-2, and MA-VEG-10, to ensure they are not in conflict.

The DEIS, p 215, Effects on Canada Lynx from Fuels Management, discusses potential negative impacts on lynx habitat from timber sale slash disposal, and states “These effects are addressed in plan direction in alternatives B, C, and D, however, to avoid negative impacts to lynx habitat.” We cannot find any such direction, either in Forestwide direction or in MA 5.13 direction. Nevertheless, we recommend deleting any language in the Plan that could be interpreted as a requirement to curtail pile burning or slash clean-up.

VEG S7 (S-LYNX-7)

-We recommend that you reword bullet #2 to “For salvage harvest activities when at least 75% of understory and green trees will be protected, as measured across a harvest unit. Post-harvest sampling will be conducted as part of effectiveness monitoring to validate results.”

-Management Approaches - We do not support the proposed use of Management Approaches for lynx direction. We are also puzzled that the Need for Change did not identify any need for changing management direction for Canada lynx habitat, yet the proposed plan contains numerous changes to management direction for Canada lynx habitat. As we commented previously, Management approaches are not plan components and cannot be used in lieu of Plan Components. That said,

-MA-LYNX-2 – we are not able to comment on those definitions, one way or the other, at this time. We request an opportunity to discuss those definitions with you and your staff and to then submit comments specific to this direction.

-MA-LYNX-4 – there is nothing in the Plan documents that supports managing 400-600 feet wide stream corridors for habitat connectivity, and we recommend that you delete that MA.

-MA-LYNX-5 – IFA requests an opportunity to participate in the evaluation and development of linkage area direction as “an agency partner.” We do not support adding that direction to the forest plan through an Administrative Change.

-MA-LYNX-6 – there is nothing in the Plan documents that supports any of these changes. As you know, we are advocates for updating lynx direction from what is in the SRLA, but only with some scientific basis and rationale. Neither have been presented here, and therefore, we do not support these “considerations.” We would appreciate an opportunity to discuss this with you or your staff and then submit comments specific to this proposed direction.

Addition of Supplement to Standard S1 - there is nothing in the Plan documents that provides any rationale for this supplement. We would appreciate an opportunity to discuss this with you or your staff and then submit comments specific to this proposed direction.

Snow Compaction –

-The DEIS, p 215 – 216, and elsewhere, discusses snow compaction (“snow compaction is considered to be a potential issue for lynx ...and “may result in competition for ... snowshoe hare that lynx depend upon) and states that “under all alternatives, the baseline is not to be exceeded ...” However, the literature doesn’t seem to support the premise of snow compaction increasing competition with other snowshoe hare competitors.

For example, according to the USFWS (FR, September 12, 2014, p 54829) –

“Snowmobiling occurs throughout the areas designated as lynx critical habitat, and understanding of the potential effects of snowmobiling on lynx continues to evolve. Concerns about potential negative impacts of snowmobiling are based primarily on the hypothesis that compacted over-the-snow trails could result in increased competition between lynx and other snowshoe hare predators, such as coyotes, in areas where deep snow would otherwise preclude or minimize such competition (Buskirk *et al.* 2000a, pp. 86–95). Research on the relationship between coyotes, lynx, and lynx habitat has provided mixed results regarding this hypothesis, with several studies showing that coyotes use compacted snow trails, but none indicating increased competition or substantial dietary overlap between lynx and coyotes (Interagency Lynx Biology Team 2013, pp. 80–82). In response to this uncertainty, the 2013 revisions to the LCAS provided more flexibility with respect to the management of recreational activities in lynx habitat.”

Further, Kolbe et al. 2007 concluded the following:

- “Therefore, we found no evidence that snowmobile trails were associated with coyote foraging sites on our study area.”

- “It is unlikely that limiting compacted snowmobile trails on our study area would significantly reduce exploitation competition between coyotes and lynx during winter.”

Based on the findings from the USFWS and from Kolbe et al, 2007, we recommend that you delete HU 01 and proposed MA-LYNX-4.

-DEIS, p 210, 3rd paragraph – with regard to lynx habitat mapping, the SRLA did not designate lynx habitat. Instead, the SRLA established general direction that would be applied to mapped lynx habitat (ROD, p 6). The criteria used for lynx habitat was “vegetation that **could** [emphasis added] contribute to lynx habitat” (SRLA-FEIS App F,

NRLA-FEIS App B), regardless of lynx occupancy, use, or probability of long-term persistence. The Forest Service's decision that all national forest lands that "could contribute to lynx habitat," as identified by wildlife biologists, would be managed as lynx habitat is, to our knowledge, unprecedented, and certainly a much higher standard than for other T&E species, such as grizzly bears or spotted owls.

The 2011 habitat map included 867,241 acres of primary habitat and 170,847 acres of secondary habitat, for a total of 1,038,088 acres of suitable lynx habitat. That compares to 952,900 acres of suitable lynx habitat in Table 3.1 of the 2008 SRLA FEIS.

Unfortunately, the Forest Service has never allowed public review of or comment on lynx habitat mapping or even the protocols for lynx habitat mapping. We view that as a serious shortcoming considering the significant effects of whether a particular acre is mapped, or not mapped, as lynx habitat, and recommend that you allow public review and comment on lynx habitat mapping as part of completing the forest plan revision.

We also recommend that you analyze the underlying assumption that all lynx habitat is equally important. To go a step further, the Lynx Assessment discusses "inability to map suitable [lynx] habitat" and "uncertainties associated with baseline habitat condition changes due to significant natural events such as spruce beetles." We question why the RGNF needs to map lynx habitat. We don't know of any other species for which the Forest Service does comparable habitat mapping. From the outside looking in, lynx habitat mapping is time consuming, arduous, contentious, and expensive, and the benefits of the time and expense of that mapping is very questionable. We recommend that any remapping or determining what constitutes high-quality lynx habitat be completed as part of the forest plan revision, be open to public involvement, and that the IFA be involved regardless of whether those are done during forest plan revision or at some other time.

-Finally, a premise of the SRLA was that national forests are either occupied or not occupied in their entirety. We recommend that the FS consider a process whereby portions of the Rio Grande NF could be considered occupied, or not occupied. We further recommend that the RGNF consider a sliding scale of lynx habitat "importance," based in part on the prescience, or absence, of lynx, and then develop forest plan direction for "low value" lynx habitat that is less restrictive than direction for "high value" lynx habitat.

-DEIS, p 210, 5th paragraph – the "preliminary results from the lynx study" should have been identified and discussed in the DEIS. We recommend that you identify the revised direction and your rationale for the revised direction for public review and comment prior to the FEIS and ROD.

-DEIS, p 211, 3rd paragraph – considering the effects of the spruce beetle epidemic, the "long-term persistence" of mature spruce-fir stands may have been over-estimated, and hence the benefit over-estimated. In line with our earlier comments, that would seem to add more weight to the 2013 LCAS CM #1 (p 90), which states - "Provide a mosaic that

includes dense early-successional coniferous and mixed-coniferous-deciduous stands, along with a component of mature multi-story coniferous stands.”

-DEIS, p 211-212 – we are surprised at the lack of current lynx population data. If there are more current data, we recommend that you add it; if not, then we recommend that you acknowledge the limits of your knowledge about current lynx population dynamics. We recommend that you identify the revised direction and your rationale for the revised direction for public review and comment prior to the FEIS and ROD.

-DEIS, p 212, bullet #2 – again, based on the effects of the spruce bark beetle epidemic, a conservation focus on late-successional spruce-fir cover types appears to be no more than a short-term strategy that carries high risks for the longer-term. We recommend a longer-term strategy along the lines of the 2013 LCAS CM #1 (p 90), which states - “Provide a mosaic that includes dense early-successional coniferous and mixed-coniferous-deciduous stands, along with a component of mature multi-story coniferous stands.”

Finally, we recommend that the Revised Plan recognize the value of precommercial thinning spruce-fir stands in speeding the development of mature forest conditions and associated lynx habitat, including on non-suited timberlands.

-DEIS, p 212, 3rd paragraph and bullets, starting with “Connectivity attributes...” – the SRLA direction on connectivity is in regards to recreational activities, developed recreation, highways, and maintenance level 4 or 5 roads, not forest management activities.

We are concerned that designation and/or management of “connective habitat” would have further adverse effects on forest management. The SRLA direction is very vague; the definition of “Habitat connectivity” is “Cover (vegetation) in sufficient quantity and arrangement to allow for the movement of lynx.” Considering a) that the SRLA contains very little specific direction about managing for connectivity, b) that the USFWS’s concern about habitat connectivity appears to be primarily “high volume, high speed highways” and suburban developments (see Fed Reg, March 24, 2000, p 16080), c) that the USFWS has “no information demonstrating that forest roads negatively impact resident lynx populations” (see Fed Reg, March 24, 2000, p 16080), and d) the documented travels of ‘Colorado’ Canada lynx to Alberta, Kansas, Utah, Wyoming, New Mexico, Montana, Idaho, Arizona, Nebraska, and Nevada across many miles of “unsuitable habitats,” we recommend that any identification/designation of “connective habitat” as part of the RGNF forest plan revision include a discussion of the need for that designation, the benefits of that designation, how those would be managed, and how those would affect overall management of, and outputs from, the RGNF, with an opportunity for public review and comment. We recommend no changes in current forest plan direction for lynx connectivity.

-DEIS, p 214, paragraph 2 – we question the assertion in the next-to-the-last sentence that “the forest management (timber) program has the greatest potential to influence Canada lynx.” Given the recent fire history on the RGNF, the volume of dead fuels, the increase

in fire growth by ERC in Table 35, the natural history of large, stand replacement fires in spruce-fir forests, the low number of acres of timber harvest annually, and the avoidance of the West Fork burn area by lynx, we suggest that fire has the greatest potential to influence Canada lynx. Whether more or less or the same “potential to influence Canada lynx” as timber management, we recommend that you acknowledge the significant potential for fires to adversely affect lynx habitat.

-DEIS, p 215 – Effects on Canada Lynx from Vegetation Management – according to the discussion, there is revised [lynx] direction in alternatives B, C, and D. That should have been identified and discussed in the DEIS. We recommend that you identify the revised direction and your rationale for the revised direction for public review and comment prior to the FEIS and ROD.

-DEIS, p 215, Effects on Canada Lynx from Fire Management – We agree that “Fire Exclusion” isn’t an issue. However, as discussed in regards to p 214, large fires have the potential to adversely affect lynx habitat, and that should be discussed directly, instead of the current generic and meaningless discussion. Research from the West Fork Complex has shown that lynx are only using a very small amount of the burn area, directly adjacent to green stands.

-DEIS, p 215, Effects on Canada Lynx from Fuels Management – We recommend rewriting this section to eliminate the suggestion that pile burning and other slash clean-up activities from timber harvest a) will have negative effects on lynx habitat or b) would be curtailed in order to avoid negative impacts to lynx habitat. Further, we recommend deleting any language in the forest plan that could be interpreted as curtailing pile burning or slash clean-up.

-DEIS, p 219, third paragraph – as you know, the first sentence isn’t quite accurate. In the March 24, 2000 listing decision, the USFWS stated “Timber harvest and associated forest management can be benign, beneficial, or detrimental to lynx depending on harvest methods, spatial and temporal specifications, and the inherent vegetation potential of the site.” The USFWS then went on to say the following, in reference to the Northern Rockies/ Cascades and Southern Rockies – “However, considering the overall proportions of lynx forest types affected, timber harvest and precommercial thinning on Federal lands are not currently conducted, nor are they likely in the projected future to be conducted, at levels likely to impact lynx at the population level” (FR, p 16072).

Since then, the USFWS has repeatedly discussed the low quality of habitat in the Southern Rockies Geographic Area for lynx, including the following three quotes from the September 12, 2014 Federal Register:

“... we conclude that habitat in Colorado and other parts of the Southern Rockies is marginal, naturally fragmented, and disjunct; that it has not been historically capable of supporting natural resident lynx populations; that it has not been demonstrated to contain all of the physical and biological features essential to lynx in adequate quantity and spatial arrangement to support lynx populations

over the long term (i.e., it does not contain the [Primary Constituent Element]); and that it is not essential to the conservation of the [Distinct Population Segment]” (p 54795).

-“even the best potential lynx habitat in the Southern Rocky Mountains is marginal and unlikely to support lynx populations over time” (p 59817).

-“the contribution of the Southern Rockies to the persistence of lynx in the contiguous United States is presumably minimal” (p 59817).

A major reason that forest management and timber harvest were not identified as risk factors is the relatively high proportion of undevelopable acres and the relatively low proportion of timber harvest acres. For example, the RGNF is 1,837,661 total acres, of which 392,190 acres are designated Wilderness (21%), 518,600 acres are Colorado Roadless Areas (28%), and only 291,325 acres are suited timberlands (16%). Further, the total FY 16 timber harvest acreage was only 2,308 acres (.1%). The relative scale of forest management should have been discussed in the DEIS.

Wildlife and Plants

-The DCs need to be rewritten to conform to the definition of Desired Condition in the 2012 Rule so they are measurable and monitorable.

-S-WLDF-1 – this Standard is too vague for us to support. Avoiding or minimizing disturbances ‘as much as possible’ could easily be interpreted as prohibiting any disturbances from April 15 to July 1. It is crucial that purchasers and loggers be able to operate close to year-round; we recommend that you delete this Standard.

-S-WLDF-2 – we do not support a Standard that requires adherence to “current regional guidance,” especially when the details of that regional guidance are not disclosed or could change. We recommend that you delete the reference to “current regional guidance” and that you review overlap between this Standard and S-WLDF-5.

-S-WLDF-3 – we recommend that you delete the requirement for “security habitat;” if you decide to keep the “security habitat” requirement, you need to define “security habitat” and how the requirement would be implemented. It is crucial that purchasers and loggers be able to operate close to year-round; therefore, we recommend that you minimize timing restrictions and that any timing restrictions be qualified with “Unless otherwise agreed in writing by the District Ranger ...”

-S-WLDF-4 - we question the need for this Standard, and we recommend that you delete it. Even if it is retained, it is too vague, and should be rewritten to identify specific requirements.

-S-WLDF-5 – we question the need for this Standard; it is not discussed in the DEIS, and, therefore, we recommend that you delete it. It is crucial that purchasers and loggers be

able to operate close to year-round. Even if it is retained, it is too vague, and should be rewritten to identify specific requirements.

-S-WLDF-9 – There is no discussion in the wildlife report regarding a need for “screening cover.” There is also no discussion of what constitutes “screening cover” and how it would be accomplished. We recommend that you delete this Standard.

-S-WLDF-12 – we read this to mean no timber harvest operations will be allowed on severe winter range and winter concentration areas from November 1 to April 15. It is crucial that purchasers and loggers be able to operate close to year-round; therefore, we recommend that you minimize timing restrictions and that any timing restrictions be qualified with “Unless otherwise agreed in writing by the District Ranger ...”

-G-WLDF-1 – we do not support a Forest inventory for raptor nests – that is an expensive and unnecessary commitment. Any protective measures for raptor nests and nest areas belong in Plan Components, not in an Appendix. We are very concerned about the cumulative effect of timing restrictions on operations. It is crucial that purchasers and loggers be able to operate close to year-round; therefore, we recommend that you minimize timing restrictions and that any timing restrictions be qualified with “Unless otherwise agreed in writing by the District Ranger ...”

-We do not support the proposed use of Management Approaches for Wildlife. Management approaches are not plan components and cannot be used in lieu of Plan Components. When you rewrite the Management Approaches as Plan Components, we recommend that you simply delete about 50% of them.

-MA-WLDF-3 and 5 – we recommend identifying specific management needs in Plan Components instead of referencing recommendations or plans from other organizations or agencies.

-MA-WLDF-23 – we recommend rewriting this MA as a Plan Component, and that not limit management activities designed to support ungulate populations that are higher than state population objectives.

-MA-WLDF-27 – as discussed in regard to MA-LYNX-4, we see no reason for 400 to 600 feet-wide movement zones. There is no discussion in the DEIS or the wildlife report about a need for such wide movement zones. We recommend much more targeted and focused movement zones throughout the Plan, and specifically recommend that you delete this MA.

Terrestrial Ecosystems

-Insects and Disease – we recommend having specific plan components for this section, rather than just management approaches. After carefully reviewing the other sections that were identified as having specific plan components for insects and disease, we did not find any that were actually specific to insects and disease or measurable. With the current and on-going insect epidemics, it is critical that plan components be developed.

Soils

-The DC's need to be rewritten to conform to the definition so they are measurable and monitorable.

DC-SOIL-3 – we recommend adding language to the DC that states, “without compromising fire risk.”

MA-SOIL-1-4 – these management approaches are vague and therefore cannot be measured or monitored. If kept, they should be rewritten to be specific.

Vegetation Management

All DCs – We recommend that all of the DCs be rewritten to conform to the definition of DCs, so they are measurable and monitorable.

DC-VEG-1 – we recommend condensing this DC down to about 2 sentences plus Table 5. There is no need to go into explanations or rationale as part of a DC. Since late successional forest conditions are covered in DC-VEG-4 and 5, there is no reason to discuss late-successional and old forest conditions in DC-VEG-1, and we recommend you delete the first sentence on p 37. According to p 86 of the Wildlife Report, “In general, data suggest that the forest is well above the minimum amount of snags recommended for the various forest types.” Actually, the data do much more than “suggest” that; the data, specifically stand exam data and FIA data, as represented in Figure 6 and Figure 7 on page 36 of Assessments 1 and 3, are very clear that the numbers of snags far exceed minimum amounts of snags. Also, according to p 86 of the Wildlife Report, “Minimum requirements for retained snags in the 1996 Rio Grande Forest Plan are the minimum requirements for adequate wildlife habitat and ecosystem function.” Considering the widespread mortality from the spruce bark beetle epidemic and the resulting large numbers of snags across the landscape, we see reason to be concerned about snags on the RGNF or to require more snags on suited timberlands than what is required in the 1996 forest plan.

DC-VEG-2, DC-VEG-4, DC-VEG-5, and DC-VEG-8, should all be combined into a single DC that includes regeneration, ‘the next forest,’ and the desired conditions in Table 6 (as modified per our other comments and recommendations). We recommend that to the fullest extent possible, Old Forest be identified and managed on non-suited timberlands.

DC-VEG-9 – snags are covered adequately in DC-VEG-1. We recommend that you delete this one.

-Pg. 39 – Table 6 – We support use of this kind of table for identifying desired forest vegetation conditions. We request that you also include a description of how current conditions were measured, how the Desired Condition percentage was developed, and how that compares to the RNV.

-OBJ-VEG-1 and OBJ-VEG-2 – we recommend that you increase the number of acres diversified or restored to at least the number of acres to be managed annually through the timber sale program, as outlined in OBJ-VEG-3. The low number of acres listed isn't enough to make any difference at a landscape level.

-OBJ-VEG-3 – we recommend that you add a volume to this Objective, specifically 90,000 ccf annually, and that you broaden the purpose to include forest management benefits as well, as stated in MA-VEG-10.

OBJ-VEG-4 AND OBJ-VEG-5 – we recommend that you clarify the difference between these.

-S-VEG-6 – the first two sentences contradict each other; we recommend that you rewrite the Standard along the lines of “Openings will not be created larger than 40 acres, regardless of forest type, unless one of the following is true: ...”

Guidelines – We recommend that you add a guideline along the lines of the following: “Stands that have been historically managed and regenerated should be intensively managed to maximize timber production.” There are a lot of stands that have regenerated nicely from previous management, and those should continue to be actively managed.

-MA-VEG-1 – 10 – there are some good concepts in these MAs, but they are generally too vague to be useful. We recommend that you either rewrite them as general description for Vegetation Management or as Plan Components. Management Approaches are not Plan Components, and cannot be used as Plan Components. We do not support the use of Administrative Changes to change Management Approaches as a way to get around public involvement.

-DEIS, p 132 - the Effects on Forest Products from Wildlife Management section is much too vague to fully understand the proposed changes, the rationale for the proposed changes, how BASI was used to develop those changes, or the effects of the proposed changes. We request an opportunity to discuss those details in person with you and your staff and to then refine our comments.

We are very concerned that “areas have been deferred from harvest due to the presence of high quality lynx habitat, and this amount has varied by project.” If harvest is allowed by the SRLA, then there is no reason to defer that harvest. The SRLA direction is onerous and restrictive, and the RGNF should be implementing salvage and restoration to the fullest extent allowed.

Air

As a group, the DCs are too vague to be useful, and they cannot be measured or monitored. We recommend you rewrite them. We are particularly concerned about DC-AIR-4 and 5, as they could significantly restrict project design and implementation.

Areas of Tribal Importance

We recommend that you rewrite the Plan Components and MAs to conform to definitions and purposes in the 2012 Planning Rule.

Congressionally Designated Trails

-DEIS p 290 discusses a Specially Designated Geographic Area for the CDT in Alternative B, a Specially Designated Management Area for the CDT in Alternative C, and a Congressionally Designated Trail Management Area for the CDT in Alternative D. Neither the DEIS nor the Draft Plan are very clear about the purpose or function of the Alternative B Specially Designated Geographic Area; there is some discussion on DEIS p 72-72, but not enough details, especially regarding how the proposed Geographic Area would apply when the CDT goes through Management Areas ranging from Designated Wilderness to Forest Products.

From the information presented in the documents, our recommendation is 1) not to have Forestwide Plan Components for the CDT, 2) to include CDT Plan Components in individual Management Areas that the CDT traverses, 3) not to have identical management for the CDT in different Management Areas, and 4) to not have a separate Management Area or Geographic Area for the CDT. That would take more time now, but it would be more straight-forward when it comes to project implementation.

-According to the Cumulative Effects discussion on DEIS p 290 “Implementation of any of the alternatives could result in short-term impacts that result in long-term benefits.” We agree with the concept, but we don’t believe that that accurately portrays the CDT Plan Components on p 49-53 of the draft Plan, many of which we fear would be interpreted much more restrictively.

-DC-CDT-1, DC-CDT-8, S-CDT-4, and G-CDT-2, G-CDT-3, G-CDT-9, and G-CDT-10 all speak to scenic values adjacent to the Continental Divide Trail. However, they are not altogether consistent, which could potentially create issues during plan implementation. We support managing areas adjacent to the CDT to reduce impacts to the scenic values from the trail, including feathering, screening, slash disposal, and protection of the actual trail itself. We do not support managing the foreground and middle-ground viewshed to preserve a setting that appears natural; considering that the spruce beetle epidemic is a ‘natural’ event, a desired condition of “naturally appearing” could easily be interpreted to preclude any timber harvest adjacent to the CDT, as stated in DC-CDT-1. So doing directly conflicts with language in the National Trails System Act (Section 7a), i.e., “Development and management of each segment of the National Trails System should be designed to harmonize with and complement any established multiple use plans for that specific area in order to insure continued maximum benefits from the land.” We recommend that you condense and clarify those Plan Components to provide consistent direction that does not require management for “natural” conditions and allows otherwise allowable forest management.

-DC-CDT-7 – we recommend that you delete “natural” in the last sentence.

-G-CDT-11, G-CDT-12, and MA-CDT-13 all address fire management adjacent to the CDT. We recommend that you 1) delete the requirement for “minimum impact suppression tactics” and the restrictions on heavy equipment line construction, and 2) that you condense the remainder of those 3 Plan Components into a single Guideline.

-G-CDT-13 – we recommend that you clarify that the Forest Plan trumps the Comprehensive Plan. If a modification to the Comprehensive Plan creates a conflict with the Forest Plan, the Forest Plan would continue to be implemented unless, and until, the Forest Supervisor amends the Forest Plan.

-CDT Management Approaches – we recommend that you delete MA-CDT-6, MA-CDT-10, and MA-CDT-11 and that you condense and rewrite the remainder as Objectives.

-We do not support removing a ½ mile corridor on each side of the CDT from Suited Timberlands, for the sole reason of the CDT, as proposed in DEIS Appendix B, p 509. So doing directly conflicts with language in the National Trails System Act (Section 7a), i.e., “Development and management of each segment of the National Trails System should be designed to harmonize with and complement any established multiple use plans for that specific area in order to insure continued maximum benefits from the land.”

Cultural Resources

-The DCs need to be rewritten to conform to the definition so they are measurable and monitorable.

-DC-CRT-5 and DC-CRT-6 are redundant and should be combined.

-DC-CRT-7 – we recommend removing “natural forces” from this DC unless there is a specific plan component identified that will help achieve this DC. With the significant amount of mortality, it will be nearly impossible to protect all significant cultural resources from the dead and dying trees.

-MA-CRT-1 – we recommend changing this MA to a DC.

-MA-CRT-19 and MA-CRT-21 – these two management approaches are very similar and should be combined.

-DEIS, p 296 – The following statement from Direct and Indirect Effects on Cultural Resources is very derogatory toward our members – “Under Alternative C, if larger and expedited timber harvest is expected, negative effects on cultural resources could include increased artifact collection by contractors.” That is unprofessional and inappropriate, and should be deleted.

Fire Management

-we recommend adding Standards along the lines of the following:

Initial response to unplanned ignitions where suited timberlands are present generally favors full suppression and managing fires to accomplish resource

protection objectives, but opportunities to manage fire for resource benefits are possible.

Key values within the suited timberlands warrant fire management responses that mitigate the effects or prevent losses from fire. In some situations, resource benefit objectives can be achieved using wildfire, but the use of wildfire is secondary to meeting protection objectives for other values.

-DEIS, p 113 – the first paragraph asserts that a large portion of the RGNF cannot be economically treated with prescribed fire, and then makes the case for managing wildfires as a means of ecosystem restoration with the implication that managing wildfires is more ‘economical’ than prescribed burning. We recommend that you explain how managing a wildfire for ecosystem restoration is more economical than prescribed burning.

-DC-FIRE-1 – there is no way to measure or monitor this vaguely worded DC. In any event, we do not support this DC for suited timberlands.

DC-FIRE-5 – since natural ignitions are unplanned, by definition, we recommend deleting “unplanned.” We do not support this DC being applied to suited timberlands. We also feel this DC is too broad and should include some parameters. We recommend changing this DC to include only those management areas where it is appropriate and to add some specific details on when and where this would be applied.

MA-FIRE-1- 11 – we do not support any of the management approaches that allow unplanned natural ignitions to burn on suited timberlands and recommend changing those management approaches to include only those areas that are appropriate.

MA-FIRE-1 – we do not support application of the MA to suited timberlands.

Scenery

We do not support the Scenery Management System’s basis of “natural or unaltered,” considering the continual natural disturbances in the Rio Grande NF, including the spruce beetle epidemic and recent large fires. It also appears that the Scenic Integrity Objectives don’t adequately consider the long-term benefits of managing the Forest to be consistent with ‘natural’ succession and disturbance regimes (DC-VEG-2, among others).

-Only Congress can designate Wilderness. It is inappropriate for the FS to manage ‘recommended’ wilderness as designated Wilderness. Per the second paragraph on p 266, it is inappropriate for the Forest Service to change scenic integrity objectives for “all additional lands analyzed for recommended wilderness;” we recommend no change to current scenic integrity objectives for those lands. We recommend the same protocol for Alternative D (per the third paragraph on p 268).

-DC-SCNY-1 – this does not meet the definition of a Desired Condition and is too vague to be meaningful or measurable or monitorable.

-DC-SCNY-2 – as discussed previously, the spruce beetle epidemic and recent large fires are ‘natural events;’ we recommend allowing forest management projects the same latitude.

-OBJ-SCNY-1 – there is no discussion in the DEIS about how, where, and why this was selected as an Objective, nor any discussion about the magnitude of work or the cost of achieving it. We recommend refining this OBJ to be more specific.

-G-SCNY-1 – we recommend rewriting this Guideline to be clearer and more specific.

-G-SCNY-2 – this apparently requires rehabilitation of all areas with low scenic integrity, but there is no discussion in the DEIS about this Guideline or the workload or costs associated with achieving it. We recommend rewriting this as an Objective with a targeted number of acres to be rehabilitated annually or per decade.

-MA-SCNY-2 – this needs to be better defined and ideally synchronized with Vegetation Management DCs, so there is a clear understanding of what it means and how it will be implemented. We recommend that you acknowledge in a Plan Component or in the FEIS that in portions of the spruce-fir forest on the RGNF, previously harvested and regenerated stands are the only green stands.

Chapter 3, Geographic Areas, Fire Management Zones, and Management Areas

General Forest Geographic Area Management Approach Summary

-we don’t see the use of Geographic Areas as very helpful. In fact, as presented, those all seem cumbersome. The Plan does not include any details on acreage or locations of the General Forest GA.

-in the event you decide to keep GAs, we offer the following comments on language in the proposed Geographic Areas:

-p-69 - we support aggressive salvage during the first decade of the Plan, and we agree that deterioration of the dead spruce will lead inevitably to less spruce salvage in the second decade. We interpret the second paragraph as an intent to only harvest green timber in mixed-conifer and other non-spruce forest types. We do not support that approach. We recommend allowing management and harvest in green spruce stands where possible, and that you develop Plan Components that will facilitate that. The suited timberlands are a small component of the RGNF, only 26 percent for Alternative 3, and we want to see continued active forest management on the suited timberlands.

-we recommend you change the last sentence in paragraph 2 on p 70 to “Vegetation is managed for wood production and to benefit other resources.”

-we recommend that you delete “All vegetation management is sustainable” in the 3rd paragraph on p 70. We are big advocates for sustainable forest management in green forests, but that concept simply does not apply to a dead forest.

Specially designated Geographic Area Management Approach Summary

-we don't see the usefulness of this GA and recommend that you delete it

Primitive Wilderness Geographic Area Management Approach Summary

-we don't see the usefulness of this GA and recommend that you delete it

Fire Management Zones Management Approach Summaries

-There seems to be a helpful concept underlying the Wildland Fire Management Zones, but the discussion on 69-73 is far too superficial for us to support it. We are especially concerned about the lack of any specificity on how wildfires would be managed in either Zone. For example:

-The section at the bottom of p 72 is titled “Fire Management Zone Management Approach Summaries.” However, referring to something as a “summary” implies there are more details somewhere, but we don't see more details anywhere in the Plan or DEIS.

-The second paragraph under “Fire management Zone Management Approach Summaries” states that “some specific direction may be needed at the management area level,” but there is no specific direction regarding fire management in MA 5.13, Forest Products. We want to see specific direction that identifies protection of suited timberlands, including timber, as a Standard.

-We don't see a discernable difference in direction between WFMZ-R and WFMZ-PB. WFMZ-R states “All wildland fires can be managed for multiple objectives.” WFMZ-PB states “All lightning-caused wildfires ... will be assessed on an individual basis for the most appropriate response based on values at risk and potential benefits to natural resources from a wildfire.” That pretty well leaves the door open for any approach – we recommend more targeted direction (see our comments on MA 5.13).

-Consider also the following sentence from DEIS p 115 - Pg. 115 – “All lightning caused wildfires in [Resource Protection and Benefit Zone] would be assessed on an individual basis for the most appropriate response based on values at risk and potential benefits to natural resources from a wildfire.” Again, we don't see a discernable difference or direction.

In the event you decide to keep Fire Management Zones, we offer the following comments on language in the proposed Fire Management Zones:

Wildfire Fire Management Zone: Resource Restoration (WFMZ-R) - We recommend changing “naturally occurring unplanned wildfires” to “naturally

occurring wildfires.” We also recommend changing “minimal emphasis on suppression” to “emphasis on minimal suppression.”

Wildland Fire Management Zone: Resource Protection and Benefit – we recommend that all wildfires in this Zone be managed with the objective of protecting suited timberlands, especially MA 5.13. We commented on this in our October 28, 2016 comment letter, but those comments have not been incorporated.

Management Areas

Big picture, we are concerned with the abuse of Management Approaches in lieu of Plan Components. That is inappropriate. We also question the concept of “Integrated Desired Conditions” – those don’t fit the definition of Desired Condition, they cannot be measured or monitored, and they are frankly too vague, and we are concerned that they will not be interpreted and implemented consistently. We recommend that you rewrite the Plan Components, Management Approaches, and Integrated Desired Conditions for all Management Areas.

Overlapping Management Areas – this discussion should be in individual MAs.

MA 1.1 – Designated Wilderness

1.1-S-1 – we recommend ending the sentence after “character.” By definition, the Standard applies to congressionally designated wilderness. Since “areas recommended for wilderness designation” are not “Designated Wilderness,” direction for those areas in MA 1.1 is inappropriate.

Recommended Wilderness – MA 1.1a should be identified and discussed as a separate Management Area. As a general matter, we do not agree with the assertion that MA 1.1a direction should be the same as for MA 1.1 – only Congress can designate Wilderness, and the Forest Service does not have the authority to manage non-Wilderness as Wilderness. We agree that “existing wilderness characteristics” should be maintained. However, existing uses, even if prohibited in Designated Wilderness, should be allowed to continue.

MA 3.5 – Colorado Roadless Areas

We recommend that you delete “No new road construction occurs in designated roadless areas,” since the Colorado Roadless Rule clearly contains some exceptions for road construction.

MA 4.21 – Scenic Byways and Scenic Railroads

This MA includes lands in the suited timber base. In the third paragraph, we recommend that you delete “or visible” and “which feature high quality scenery.” We recommend that you also acknowledge the possible contributions of commercial timber harvest to removing hazard trees and to maintaining or restoring healthy, resilient ecosystems.

MA 4.3 – Dispersed and Developed Recreation

We recommend that you delete 4.3-MA-2.

MA 5.13 – Forest Products

It's impossible for us to tell how Integrated Desired Conditions will be interpreted or implemented. For example, the second paragraph contains the following – 1) landscape diversity is similar to natural conditions, including consideration within a spatial context, 2) all succession stages are represented, and 3) mature stands are identified for old growth characteristics. We are concerned that the first desired condition will require analysis and determination of “natural conditions” – since most of the RGNF is currently dead as a result of a “natural” spruce beetle epidemic, that could mean manage for dead trees. We are concerned that the second desired condition is meaningless, since “all succession stages” will always be represented in some proportion. We are also concerned that the third desired condition could be interpreted to require management of all “mature stands” as old growth. We want to see this direction better thought-out and articulated in the Plan, and recommend you go back to the drawing board to get that done.

Pg. 87 – Integrated Desired Conditions for MA 5.13 in conflict with wildland fire management zone goals.

We recommend language along the lines of the following (from the Shoshone NF forest plan) be added for MA 5.13 and any other MA that contains suited timberlands –

“The initial response to unplanned ignitions in the management area generally favors consideration of managing fires to accomplish resource protection objectives, but opportunities to manage fire for resource benefits are possible.

Key values within the management area warrant fire management responses that mitigate the effects or prevent losses from fire. Potential values at risk include suitable timber lands and forage, infrastructure and developments, wildland urban interface, utility corridors, and other investments. In some situations, resource benefit objectives can be achieved using wildfire, but the use of wildfire is secondary to meeting protection objectives for other values within the management area.”

MA 5.41 – Big Game Winter Range

We support this management area including suited timber lands. However, paragraph 3 states that “Disturbance is limited during the primary winter use period,” while paragraph 4 states that “Vegetation treatments occur during the winter.” Flexibility for winter logging is crucial for forest products companies, and we recommend you rewrite that direction to provide flexibility for winter operations.

5.41-S-1 - We recommend that you edit this Standard to ensure that logging equipment is not included in the ‘off-road’ travel restriction.

Table 12 – Since MA 5.41 includes suited timberlands, Table 12 should show Commercial Timber Harvest as Suitable in MA 5.41.

Chapter 4. Monitoring

Frankly, the Monitoring Plan is very superficial and falls far short of meeting the requirements of 219.12 or our expectations. For example:

p 92, last paragraph - as discussed in this paragraph, the Monitoring Plan includes Implementation Monitoring, Effectiveness Monitoring, and condition or surveillance monitoring. However, the last paragraph focuses only on standards and guidelines, instead of all Plan Components, especially Desired Conditions and Objectives. Instead of evaluating whether standards or guidelines are implemented under Implementation Monitoring, as stated on p 92, 219.12 specifically requires monitoring “progress toward meeting the desired conditions and objectives in the plan.” We recommend that Implementation Monitoring include a Monitoring Question or Indicator for every Objective. We don’t see that as an onerous or unrealistic requirement considering the various stakeholders’ interests.

Similarly, the Monitoring Plan should also evaluate to what extent accomplishment of Plan Components, including Objectives, has contributed to progress toward achievement of Desired Conditions (Effectiveness Monitoring). Every Desired Condition should be included as a Monitoring Question or Indicator. As we previously discussed however, the RGNF’s use of poorly written Desired Conditions makes it impossible to measure or monitor them; to build on our previous comments, we recommend rewriting the Desired Conditions and Objectives and then linking the Monitoring Plan to those.

p 94 – We agree with using existing data and outside resources to assist with monitoring; however, it’s important to be sure the right questions are being asked. Using “a suite of birds” as focal species for terrestrial forest ecosystems seems to make sense, but we are not in agreement on deferring the details of that to the RGNF’s consultation with “experts” at the BCR. We request an opportunity to be involved in that process. Similarly, using microbenthic invertebrates and beavers as focal species for aquatic and riparian systems seems to make sense, especially considering the apparent partnership opportunity with Utah State University. Again, however, we request an opportunity to be involved in the details of that process.

p 95 – the definition of Desired Conditions should be revised to conform to the 2012 Planning Rule.

p 97 – we recommend that you update the general description of Goal 1 per our earlier comments on Goal 1.

-the Monitoring Plan should be better linked to Plan Components. We see that the second Adaptive Management Question is “Is the Forest achieving goals for improving fish habitat connectivity,” but there are no goals in the forest plan for Fisheries.

-we support the concept of “Adaptive Management Questions” but note that the questions in Table 13 are “sample” questions. We request an opportunity to work with the RGNF to develop actual Adaptive Management Questions.

Chapter 5. Adaptive Management

We applaud the approach outlined on page 111. Our only suggestion is that you reword the first sentence in paragraph 2 as follows – “... Forest staff will annually post annual monitoring results and proposed changes, and the rationale for the changes, on the Forest website. In conjunction, ... meeting would be held to discuss annual monitoring results and the changes proposed ...”

Appendix A – Old Forest criteria

-Please include the “local knowledge and judgment” used for the Old Forest Criteria and the justification for any changes.

Appendix C – Timber Suitability and Analysis –

-We do not support removing acres from suited timberlands due to the Continental Divide Trail.

Table 20 – we request that you show more details on how suitable acres were calculated for each Alternative.

Appendix D. Species of Conservation Concern.

-we have numerous concerns about the process to identify SCCs and subsequent management direction for SCC habitat. We have discussed those concerns throughout our comments and in the attached spreadsheet.

Appendix F –

-Overall, the Riparian Management Zone Delineation Criteria are overly-complex and leaves a too much opportunity for wider-than-necessary RMZs. We recommend simplifying the process to a standard 100 feet or the mean height of mature dominant late-seral vegetation water influence zone as stated in FSH 2509.25 Chapter 10, page 8.

Draft Environmental Impact Statement

Chapter 1. Purpose and Need for Action

-we disagree with the overwhelming use of management approaches throughout the plan. Management approaches should not take the place of Desired Conditions and Objectives. In many cases, the management approaches will make environmental planning at the project level much more difficult and likely will make projects less economically feasible and harder to implement.

Chapter 2. Alternatives, including the Proposed Action

-In terms of the proposed action, we do not agree that Alternative B is the best choice and question why “sustainable outdoor recreation as a primary resource on the forest” would be the main driver for the new Forest Plan.

-We do not feel that adding more wilderness acres will be beneficial to the forest, nor to the communities that rely on the forest for economic development.

-In terms of reducing management area complexity, Alternative B only slightly achieves this goal.

-We are very concerned that the proposed action does not maximize salvage during the first 10 years and reduces the overall volume output for the second decade. During our meeting on November 9th, 2017, we were told the planned timber sale program was based on the previous 3 years of volume output. If that is the case, Alternative B should have a higher volume for the second decade than what is proposed. This reduction in potential volume is likely to have devastating effects on the local timber industry. We feel strongly that the RGNF should be maximizing salvage in the next 3-5 years. Ideally, we recommend the RGNF accelerate the salvage program up to the FY 18 target of 90,000 ccf/ year for at least the next three years and potentially up to 5 years depending on the level of mortality, before tapering off to a lower level.

-this chapter is very hard to read and needs to be summarized better. Without carefully looking at a map, it is impossible to tell how acres were moved between the different management areas and how that varies between alternatives. For instance, we know that the suitable timber acres change between the alternatives, but we don't know how they are moved between the Management Areas. Also, Table 1 on p 28 and Table 3 on p 35 do not match, further adding to the confusion.

Chapter 3. Affected Environment and Environmental Consequences

Air Quality

-we disagree that “wildfire emissions, depending upon the year, can be the most significant source of pollution with and around the forest, but are not controllable by management **except indirectly**, through fire suppression.” An active forest management program can directly impact the potential for catastrophic wildfire through the use of fuel treatments, salvage logging, thinning, prescribed burning, and regeneration harvests that reduce the amount of fuel available to burn. We recommend you include language in this section that discusses the benefits of active forest management. We also recommend you change the same sentence in the “Effects on Air Quality from Fire Management.”

-we recommend that the section “Effects on Air Quality from Timber Harvest” include a discussion on the benefits of active forest management. By completing approximately twice as much salvage in Alternative C, that fuel will permanently be removed and will

not be available to burn in a wildfire. Secondly, Alternative C proposes to actively manage significantly more volume in the second decade than Alternative B. This will help reduce the amount of available fuel to burn and will increase resilience.

Forested Ecosystems

-we recommend including regeneration as a key ecosystem characteristic in addition to the ones already listed. Young forests play a very important role, especially for the Canada lynx and other species that rely on regeneration. With the current spruce beetle epidemic and the previous large wildfires, the future forest depends on adequate regeneration. While young forests/regeneration is likely considered under “Diversity of Vegetation,” we feel it is important enough to be a stand-alone key component.

-Table 21 should include the amount of “snow, rock, or other non-vegetated cover.” It is confusing that the Table does not add up to the entire acreage of the RGNF.

-we recommend including language on the conditions that have allowed the current spruce beetle epidemic to grow as big as it has (ex. monoculture of spruce with very little age and size diversity).

-we are concerned with the fact that “there is an abundance of spruce-fir in the young 1T/2T class, yet proposed management activities list on p 88 state “while not anticipated in green spruce-fir, a small amount may be treated through uneven-aged management over the life of the plan.” In order to have productive advance spruce-fir stands in the future, it is critical that some of the 1T and 2T stands are thinned.

-we recommend including language in paragraph 1 on p 91 that given the fact that the RGNF only manages about 17-27% of the forest, there is incredible opportunity on those acres to achieve desired conditions. In some places, the managed acres may provide not only the best habitat, but also safety for communities and protection of watersheds.

-we recommend not removing the Continental Divide National Scenic Trail and the Old Spanish National Historic Trail from suited timber lands.

-we recommend that late successional and old forest percentages come from the non-suited timberlands.

-we are concerned about the increase in snag and down woody requirement and would recommend including the justification for the increased numbers. We are also concerned that even though it states “the amounts are to be calculated as a per-acre average over a project area, that it will be implemented on only those acres that are treated. This was the case in the recent CP District-wide salvage. We recommend including additional language that clarifies this statement and perhaps give an example.

-we disagree with the “Effects on Wetlands and Fens from Management of Other Resources” in that because Alternative C represents the maximum number of acres suitable for timber harvest, it will have the greatest impacts. This is simply not true

because 1) harvest operations do not take place in the riparian and wetlands, 2) BMP's and design criteria prevent impacts from occurring, and 3) timber harvesting allows for the reconstruction and maintenance of roads, which usually reduces water quality impacts. We recommend this discussion include the above listed benefits of timber harvesting and the overall statement be changed.

-we recommend adding language to the statement "all lightning-caused wildfires in these areas (Wildland Fire Management Zone: Resource Protection and Benefit) would be assessed on an individual basis for the most appropriate response based on values at risk and potential benefits to natural resources from a wildfire" **except on suitable timber acres.**

Forest Products

-we recommend updating the paragraph that discusses the market for timber "is experiencing a prolonged decline," with recent information for 2017 that highlights the record prices for softwood lumber in 2017, with exports to China and other regions up significantly.

-we recommend including information on the new Trinchera Forest Products mill on p 128. This drastically increases capacity in the area.

Soils

-we recommend language be included on the benefits of timber harvesting on soils in terms of the benefits of road maintenance and road reconstruction. Currently, the majority of road work is getting accomplished through timber sales and vegetation projects. Without them, the majority of the work would not be done and those impacts would still be occurring.

Aquatic Ecosystems

-see note above on soils. We recommend the bottom paragraph on p 164 include a discussion on how road work is actually getting accomplished.

-again, the discussion on the effects from vegetation treatments seems to be very biased and does not include any of the benefits of vegetation management. We recommend you include discussion on how aquatic ecosystems benefit from vegetation management.

Watershed Resources

-we disagree with the effects analysis on p 178 and recommend you reconsider the overall impacts from Alternative C. Again, none of the benefits (such as road maintenance, wildfire risk reduction, etc.) are even considered. We request that the benefits be discussed in the "Effects on Watershed Resources from Vegetation Management" section as well as the "Effects on Watershed Resources from Roads and Trails" section.

-we disagree that Alternative D has the least impacts from the "Effects on Watershed Resources from Designation of Wilderness, Wild, Scenic, and Recreational Rivers,

Research Natural Areas, Special Interest Areas, and Scenic Trails and Byways. There is no discussion about the potential ramifications of less management and if a wildfire occurs. Less management does not equal less impacts!!!

Riparian, Wetlands, and Fens

-we recommend that the discussion on effects from vegetation management be changed to include language that timber harvest and vegetation management practices usually do not create any new permanent roads and any temporary roads are built with BMPs and design criteria that prohibit locating roads near water.

Infrastructure, Roads, and Facilities

-we recommend this section include language that Alternative C is likely to be the most beneficial in that more roads would be maintained and/or reconstructed due to more timber salvage and forest management projects.

Scenery

-in the Scenic Integrity discussion on p 261, we recommend that you acknowledge that large scale landscape disturbances, whether the current spruce beetle epidemic, or other insect epidemics, fires, windstorms, etc., will all affect how the Forest appears, regardless whether they are judged to be within or outside of their NRV.

Cultural Resources

-we find the statement “under alternative C, if larger and expedited timber harvest is expected, negative effects on cultural resources could include increased artifact collection by contractors” to be very derogatory and inflammatory. We request this statement be removed completely.

Recommended Wilderness

-we do not support the addition of any more wilderness acres.

Proposed Special Interest Areas and Research Natural Areas

-we do not support any new special interest areas and/or research natural areas.

Contributions to Social and Economic Sustainability

-we recommend Table 103 be updated to include the new capacity of Trinchera Forest Products.